

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-282 (PJS/ECW)

UNITED STATES OF AMERICA,

Plaintiff,

**SUPERSEDING INDICTMENT**

v.

18 U.S.C. § 2  
18 U.S.C. § 371  
18 U.S.C. § 844(i)

(1) SHADOR TOMMIE CORTEZ JACKSON,  
(2) VICTOR DEVON EDWARDS, and  
(3) LEROY LEMONTE PERRY WILLIAMS,

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

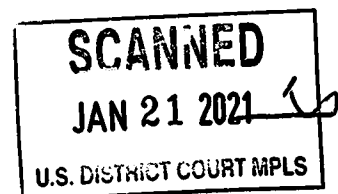
**COUNT 1**

(Conspiracy To Commit Arson)

1. On or about August 26, 2020, in the State and District of Minnesota, the defendants,

**SHADOR TOMMIE CORTEZ JACKSON,  
VICTOR DEVON EDWARDS, and  
LEROY LEMONTE PERRY WILLIAMS,**

knowingly and intentionally conspired with each other and others known and unknown to the Grand Jury to damage and destroy, and attempt to damage and destroy, by means of fire, the Target Corporation's corporate headquarters building, located at 1000 Nicollet Mall in Minneapolis, Minnesota, which is a building used in interstate and foreign commerce, and in activities affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 371 and 844(i).



United States v. Shador Tommie Cortez Jackson et al.

### **PURPOSE OF THE CONSPIRACY**

2. The purpose of the conspiracy was to commit an act of arson at the Target Corporation's corporate headquarters building located in the City of Minneapolis, in the District of Minnesota.

### **MANNER AND MEANS**

3. It was part of the conspiracy that on August 26, 2020, Jackson, Edwards, and Williams joined each other near the Target Corporation's corporate headquarters building in the City of Minneapolis, in the District of Minnesota and thereafter set, attempted to set, and agreed to set, fires in that building in the District of Minnesota.

### **OVERT ACTS**

4. In furtherance of the conspiracy and to achieve its object, Jackson, Edwards, and Williams, committed certain overt acts, including but not limited to the following:

a. On August 26, 2020, Jackson, Edwards, and Williams went to the Target Corporation's corporate headquarters building where dozens of others had gathered. Jackson used a construction sign to break through one of the glass doors into the Target Corporation's corporate headquarters building. Jackson, Edwards, and Williams, along with unidentified others, breached the doors and entered the Target Corporation's corporate headquarters building and the immediate curtilage.

b. Jackson intentionally set a fire on a counter inside the mailroom while Edwards stood nearby. Edwards later added a liquid accelerant to the fire located on the mailroom counter with the intent to fuel the existing fire.

United States v. Shador Tommie Cortez Jackson et al.

c. Jackson attempted to light a second fire in the mailroom on top of cardboard boxes using a lighter and a bottle of ignitable liquid.

d. Jackson, Edwards, Williams, and unidentified others then ran out of the building together, using the same door.

e. Williams reentered the building entrance shortly thereafter. Williams then set fire to a cardboard box and placed the lit cardboard and other combustibles in the vestibule entrance area of the building with the intent to start a fire. Williams made additional attempts to reignite the cardboard and combustibles on fire. Williams then left the building.

All in violation of Title 18, United States Code, Section 371.

**COUNT 2**

(Arson)

On or about August 26, 2020, in the State and District of Minnesota, the defendant,

**VICTOR DEVON EDWARDS,**

aiding and abetting others and aided and abetted by others known and unknown to the Grand Jury, maliciously damaged and destroyed and attempted to damage and destroy, by means of fire, the Target Corporation's corporate headquarters building, located at 1000 Nicollet Mall in Minneapolis, Minnesota, which is a building used in

United States v. Shador Tommie Cortez Jackson et al.

interstate and foreign commerce, and in activities affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2 and 844(i).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON